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12 *Attorneys for Plaintiffs*

13
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

14 IN RE HANKINS PLASTIC SURGERY
 15 ASSOCIATES, P. C. dba HANKINS & SOHN
 16 PLASTIC SURGERY ASSOCIATES

17 This Document Relates to: All Actions

18 Case No.: 2:23-cv-00824-RFB-DJA

19
STIPULATION AND ORDER TO STAY
DISCOVERY

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 22 Plaintiffs Jennifer Tausinga, Alyria Wrenn, Sarah Jefferson, and Caroline Aurora
 23 (collectively “Plaintiffs”) on behalf of themselves and all other similarly situated, by and through
 24 co-interim counsel of record, Jennifer A. Fornetti of The Bourassa Law Group and Nicholas A.
 25 Colella of Lynch Carpenter LLP and Plaintiffs’ steering committee, Raina Borrelli of Strauss
 26 Borrelli PLLC, Ramzy Ladah of Ladah Law Firm, and additional Plaintiffs’ counsel Clark
 27 Seegmiller and Jonathan B. Lee of Richard Harris Law Firm, and Defendant Hankins & Sohn
 28 Plastic Surgery Associates, P.C. dba Hankins & Sohn Plastic Surgery Associates (“Defendant”)

1 by and through its counsel of record, SCHNITZER JOHNSON & WATSON, CHTD., and co-
 2 counsel MCBRIDE HALL, hereby stipulate to stay all discovery deadlines and hearings for sixty
 3 (60) days to allow the parties to explore resolution of the action, as follows:

4 1. The Parties are in the process of scheduling mediation to explore resolution of this
 5 action. The parties are requesting a brief sixty (60) day stay on all upcoming hearings and
 6 deadlines. This includes the following hearings and deadlines that are scheduled before this court:

- 7 • Hearing on Motion to Compel scheduled for April 22, 2025 at 2:00 p.m.;
- 8 • Hearing on Motion to Dismiss scheduled for May 15, 2025 at 10:45 a.m.;
- 9 • Interim Fact Discovery Deadline scheduled for June 12, 2025; and
- 10 • Amendment and Joinder Deadline scheduled for June 12, 2025.

11 2. The parties agree to file a status report with the court by the end of the sixty (60)
 12 day stay.

13 **IT IS SO STIPULATED.**

14 Dated: April 21, 2025

15 /s/ Jennifer A. Fornetti

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14 Dated: April 21, 2025

15 /s/ L. Renee Green

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15 *Attorneys for Plaintiff Caroline Aurora*

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17 **IT IS SO ORDERED:**

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20 Dated

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28 UNITED STATES MAGISTRATE JUDGE